

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Chapter 13

LEON D. CHAMBERS

Debtor

Case No.: 19-14923-mdc

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY PNC BANK, NATIONAL ASSOCIATION**

Debtor-Respondent, Leon D. Chambers (hereafter “Debtor”) responds to the Motion of PNC Bank, National Association for Relief from the Automatic Stay, as follows:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor denies the allegations of Paragraph 6 of PNC’s Motion and strict proof is demanded.
7. Denied. Petitioner did not provide any evidence of fees and costs incurred.
8. Denied. Debtor denies the allegations of Paragraph 8 of PNC’s Motion and strict proof is demanded.
9. Denied. Debtor specifically denies the allegations of Paragraph 9 of PNC’s Motion and strict proof is demanded.
10. Admitted.

11. Denied. The allegations in this paragraph are conclusions of law to which no response is required and, therefore, they are denied.

WHEREFORE, Debtor respectfully requests an Order denying PNC Bank National Association's Motion For Relief from the Automatic Stay.

Date: September 21, 2022

BY:/s/ Vladislav Kachka
VLADISLAV KACHKA, EQUIRE
SPEAR WILDERMAN, P.C.
230 S. Broad Street, 14th Floor
Philadelphia, PA 19102
(215) 732-0101
(215) 7342-7790 (fax)
vkachka@spearwildereman.com
Attorney for Debtor